

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
DETROIT

AHMED JAHMEE,

Case No.: 2:22-cv-11214

Plaintiff,

v.

LUEDTKE ENGINEERING COMPANY,

Defendant,

COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, and cure.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crewmember aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about November 15, 2021, Plaintiff was holding a line while facing up to a scow when said line became caught in a defective/ripped tire causing said line to become stuck as the vessel pulled away causing Plaintiff's arm/shoulder to contort creating a condition he was untrained to address and he was injured because of said failure to provide a safe place to work, seaworthy vessel, and exercise reasonable care, whereafter Defendant negligently assigned Plaintiff back to regular duties thereby aggravating the underlying condition.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, *inter alia*, as follows:

- a. Pain and suffering, past future.
- b. Mortification, humiliation, fright shock and embarrassment.
- c. Loss of earnings and earning capacity.
- d. Hospital, pharmaceutical and other cure expenses.
- e. Aggravation of prior condition, if any there be.
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed.
- g. Mental anguish.
- h. Found.
- i. Maintenance, cure, and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan
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_____ /

DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

DENNIS M. O'BRYAN (P30545)

Attorneys for Plaintiff

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